Comment on Proposed Rulemaking; PS Docket No. 11-153
Federal Communications Commission
Facilitating the Deployment of Text-to-911 and Other NG911 Applications
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General Purpose

A text-based mechanism that would serve as a primary media type for contacting a PSAP would further a variety of important agendas that are highlighted in the NPRM.   But, first and foremost, it is *this* mechanism that must be perfected before turning to secondary media options such as photos and video. As mentioned in the NPRM, the primary purpose today behind text that is relayed to 911 is to enable disabled persons to communicate with emergency responders. However, the FCC concedes that TTY is grossly outdated. Regardless of the other benefits that would be served through NG911, the interest of facilitating easier access for disabled persons when seeking emergency help is, on its own, a sufficient reason for enactment of NG911.

Platforms

The FCC lays out the pros and cons of potential technical platforms to be used in accordance with NG911 (TTY, SMS, IP, RTT). It is certainly of paramount importance that the FCC chose its platform in accordance with the most widely used system in place today. This ensures familiarity, confidence and reliability on the system. One of the questions put forth in the NPRM is: "What efforts are needed to educate the public and minimize the consumer confusion as the transition to NG911 occurs and what role, if any, should the Commission play in such efforts?" These efforts would be substantially minimized if the Commission picked on the basis of the most widely used forum for text communication today.

SMS: SMS far exceeds any of the other communication platforms. In 2008 SMS was available on 98% of all cell phones – making it the only universal mobile text platform for the masses.[1] However, a fatal flaw with SMS is that the message contains no information about the caller's location and does not identify the cell tower that was used by the caller – two crucial benefits that NG911 hopes to realize.

Balancing Pros and Cons of Media Platforms

In my opinion the most important, and non-negotiable features are that the message (1) shows the callers location and, (2) the caller receives confirmation that the PSAP has received the message. As technology exists today, this leaves the Commission with choosing between RTT and IP-based messaging. Should the Commission disregard the highly important need for easy enactment (which would certainly be best served by choosing SMS) in favor of the two "pros" listed above? In my opinion,

[1] http://www.cellsigns.com/industry.shtml

the hurdle of educating the public is not insurmountably large and therefore points toward a greater weight being placed on the safety promoting benefits such as locating the 'caller' and assuring the 'caller' that his / her message has been received and help is on the way.